



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
3M Hartford City, Hartford City, Indiana

FROM: Vicky Mei, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: 3M Hartford City

Facility Location: 304S 075E, Hartford City, Indiana 47348

Date of Inspection: August 18, 2022

EPA Inspector(s):

1. Vicky Mei, Environmental Engineer

Other Attendees:

1. Chris Kirkwood, Human Resources Coordinator
2. Michael Kelsey, Advanced Environmental Engineer

Contact Email Address: mkelsey@mmm.com

Purpose of Inspection: Clean Air Act Inspection

Facility Type: Tape, label, and extruded web manufacturing plant

Regulations Central to Inspection: Monitoring of operations and recordkeeping requirements in 40 C.F.R. 60.584 for 3M's two thermal oxidizers (TO)

Arrival Time: 9:30 AM

Departure Time: 11:00 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☐ Provided Small Business Resource Information Sheet
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a Small Business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from 3M staff unless otherwise noted.

Process Description:

The facility applies adhesives to web backing or flexible vinyl. The adhesives used are water-based, polymeric, or regular solvents mixed with powders from totes. The adhesives are applied to substrates in coaters with rollers. Some substrates are pretreated for better binding of the adhesives. The solvents in the adhesive are then flashed off in curing ovens. The emissions are routed to one of two TOs. The facility also has an extrusion line that uses polytetrafluoroethylene to create extruded tapes. The extrusion process involves mixing oils and powders, which then goes into the extruder. Methyl ethyl ketone and toluene solvents are used to clean off adhesives.

Staff Interview:

There are 4 coating lines and 1 extrusion line. The curing ovens are monitored for negative pressure, as the facility is required to capture all fugitive volatile organic compound (VOC) emissions. The temperature and negative pressure are monitored on the TOs. The facility is required to continuously monitor the temperature of the TO exhaust gases. There have not been any issues with the TOs.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

There were full enclosures around the curing ovens and connected to the TOs for controlling emissions. EPA attempted to use its FLIR camera to image any VOCs from the TO stacks, but the camera was not operating properly.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Safety data sheets (SDS) of the top 5 chemicals used each year for the past 5 years or SDS of the chemicals that comprise of 90% of the chemicals used
- Most recent performance test (2019)
- Quarterly and annual emissions reports for 2021
- Justification letter for the TO required reduction
- Monitored TO parameter records for 2022

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____